

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH
CAROLINA WESTERN DIVISION
No. 5:22-CV-00015-FL**

ROBERT TERRACINO and
BRADIE TERRACINO,

Plaintiffs,

v.

TRIMACO, INC.,

Defendant.

PLAINTIFFS' RESPONSES TO DEFENDANT'S REQUESTS FOR ADMISSION

COME NOW Plaintiffs Robert and Bradie Terracino ("Plaintiffs" or "Terracinos"), and for their response to Defendant's Requests for Admission state as follows.

Request 1. Admit that for each of Defendant's "Stay Put" drop cloths and "Stay Put Plus" drop cloths, each of the circumferentially smaller bumps does not have a greater height than that of the circumferentially larger bumps.

RESPONSE: Denied.

Request 2. Admit that at least some of the downward projecting bumps present on Defendant's "Stay Put" drop cloths and "Stay Put Plus" drop cloths do not have measurable boundaries or perimeters.

RESPONSE: Denied.

October 30, 2024

Respectfully submitted,

/s/ Duncan G. Byers

Duncan G. Byers

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Special Appearance Counsel for Plaintiffs

Robert and Bradie Terracino

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2024 I sent the foregoing and attached document(s) electronically via email as follows: jmoye@btlaw.com, deborah.pollackmilgate@btlaw.com, and joseph.fehribach@btlaw.com and filed the same via CM/ECF which will provide notice to the following counsel of record.

/s/ Duncan G. Byers

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